

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01963
(MEF-MAH)

DECLARATION OF LIZA WEISBERG
IN SUPPORT OF PETITIONER'S MOTION TO SEAL

Liza Weisberg, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a Senior Staff Attorney at the American Civil Liberties Union of New Jersey Foundation. I am admitted to practice law and a member in good standing in the State of New Jersey and of the bar of this Court. I am one of the attorneys representing Petitioner Mahmoud Khalil in this action.

2. I respectfully submit this Declaration in support of Petitioner's motion to seal the redacted information contained in ECF 302, ECF 308-1, ECF 312-1, ECF 312-2, and ECF 312-3 in this action.

3. I have personal knowledge of the facts set forth herein or believe such facts to be true based upon information provided by knowledgeable persons.

4. In support of the Motion to Seal and in accordance with Local Civil Rule 5.3(c)(3), counsel for Petitioner has prepared the accompanying index identifying the redacted information Petitioner seeks to seal and describing with particularity: (a) the nature of the material; (b) the legitimate private or public interest which warrants the relief sought; (c) the clearly defined and serious injury that would result if the relief sought is not granted; (d) why a less restrictive alternative to the relief sought is not available; (e) any prior order sealing the same materials in the pending action; and (f) the identity of any party or nonparty known to be objecting to the sealing request.

5. Petitioner respectfully requests that the Court enter an Order sealing the redacted information in filings ECF 302, ECF 308-1, ECF 312-1, ECF 312-2, and ECF 312-3.

6. The text redacted from the filings includes Petitioner's A-Number, the email addresses and cellphone numbers of attorneys and Acting ICE Field Office Director Brian Acuna, and the name of one of Mr. Khalil's former colleagues. The redactions reflect the least restrictive option for avoiding harm to the safety and privacy of Petitioner and the relevant non-parties. The substance of the filings remains fully intact for public access.

7. The government consents to these redactions.

8. There is no prior order sealing the same materials in the pending action.

9. The materials Petitioner seeks to redact will aid the Court's consideration of his Petition.

10. Petitioner therefore respectfully requests that the Court enter an Order pursuant to Local Civil Rule 5.3(c) sealing the redacted information contained in the filings at ECF 302, ECF 308-1, ECF 312-1, ECF 312-2, and ECF 312-3.

I declare under penalty of perjury that the foregoing is true and correct

Date: June 27, 2025

By: /s/Liza Weisberg

Liza Weisberg